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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SAMSARA INVESTMENTS LLC SERIES 4,

Plaintiff,

vs.

THE DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT; ROE BUSINESS
ENTITIES I through X, inclusive,

Defendants.

Case No. 2:24-cv-01859-JCM-EJY

**STIPULATION AND ORDER TO STAY
BRIEFING DEADLINES**

(First Request)

Plaintiff, Samsara Investments LLC Series 4 (“Samsara”) and Defendant, The Department of Housing and Urban Development (“HUD” or “Federal Defendant”) (collectively the “Parties”) hereby represent and stipulate to the following:

1. On February 26, 2025, the Parties submitted a stipulation advising the Court that HUD and Samsara have reached an agreement in principle to settle this matter. (ECF No. 20). On February 26, 2025, the Court granted this stipulation. (ECF No. 21). To that end, HUD drafted and circulated a settlement agreement, which is in the process of being finalized and executed.

2. On March 12, 2025, Samsara amended its complaint to add an additional party, Carrington Mortgage Services, LLC, and to add additional allegations concerning HUD. (ECF No. 22).

3. On March 26, 2025, HUD filed a motion to dismiss Samsara’s first amended complaint. (ECF 28.)

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4. Samsara's response is due April 9, 2025, which would make HUD's reply due on April 16, 2025.

5. Because the Parties have reached a settlement in principle and are currently working on finalizing the settlement agreement, the Parties anticipate that any briefing related to the amended complaint and the corresponding motion to dismiss will be rendered moot. As such, the Parties agree that the Parties' deadlines to file any responses or replies to ECF No. 28 shall be stayed.

6. Based on the above, the Parties respectfully request that the Court set a date in 60 days from the date this stipulation is granted (if so ordered by the Court), by which the Parties shall file either (i) a stipulation to dismiss HUD from this action, each party to bear its own attorney's fees and costs, or (ii) a joint status report concerning settlement.

Respectfully submitted this 7th day of April 2025.

SIGAL CHATTAH
United States Attorney

HANKS LAW GROUP

/s/ Reem Blaik
REEM BLAIK
Assistant United States Attorney

/s/ Karen L. Hanks
KAREN L. HANKS
Attorney

Attorneys for Federal Defendant

Attorneys for Plaintiff

IT IS SO ORDERED.

DATE: April 9, 2025

James C. Mahan
UNITED STATES DISTRICT JUDGE